

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. *11-CR-672-01(CCC)*
 :
 v. : 18 U.S.C. § 1425
 : 18 U.S.C. § 2
 SARFRAZ CHOUDHARY :
 a/k/a "MUHAMMAD YAQOOB" : I N F O R M A T I O N

The defendant having waived in open court prosecution by Indictment, and having waived any challenge to venue and jurisdiction, the United States Attorney for the District of New Jersey charges:

1. On or about October 6, 2000, defendant SARFRAZ CHOUDHARY, a/k/a "MUHAMMAD YAQOOB" ("CHOUDHARY") filed an Application for Naturalization form, Form N-400 ("the Form") with the then-Immigration and Naturalization Service ("INS") for the purpose of obtaining United States citizenship.

2. Defendant CHOUDHARY claimed on the Form that his name was Muhammad Yaqoob, when in fact this was not defendant CHOUDHARY's true name.

3. Defendant CHOUDHARY also claimed that January 1, 1965 was his date of birth when in fact this was not defendant CHOUDHARY's true date of birth.

4. The Form further asked defendant CHOUDHARY to sign the Form both prior to its submission and after an interview with an INS official. On the part of the Form that requested a signature prior to the Form's submission, the Form stated in

relevant part that "I swear or affirm, under penalty of perjury under the laws of the United States of America that this application, and the evidence submitted with it, is all true and correct." Defendant CHOUDHARY signed the Form before he submitted it.

5. On or about November 5, 2001, in furtherance of his naturalization process, defendant CHOUDHARY appeared before a District Adjudications Officer ("DAO") with the INS. On that date, the DAO placed defendant CHOUDHARY under oath.

6. The DAO asked, in substance and in part, defendant CHOUDHARY to confirm his name. Defendant CHOUDHARY falsely stated that his name was Muhammad Yaqoob.

7. The DAO also asked, in substance and in part, defendant CHOUDHARY to confirm his date of birth. Defendant CHOUDHARY falsely stated his date of birth was January 1, 1965.

8. On or about November 5, 2001, defendant CHOUDHARY again signed the Form, and affirmed under penalty of perjury that the statements made therein were true to the best of his knowledge and belief.

9. Based upon, among other things, defendant CHOUDHARY's statements in the Form and defendant CHOUDARY's statements and actions before the DAO on or about November 5, 2001, defendant CHOUDHARY was naturalized on or about July 16, 2002, and became a citizen of the United States.

10. On or about July 16, 2002, defendant

SARFRAZ CHOUDHARY

did knowingly and willfully procure and attempt to procure, contrary to law, the naturalization of a person, namely himself, in that defendant CHOUDHARY: (1) while under oath provided a false name to an INS officer; and (2) while under oath provided a false date of birth to an INS officer.

In violation of Title 18, United States Code, Sections 1425(a) and 2.

A handwritten signature in cursive script, reading "Paul J. Fishman", written in dark ink. The signature is fluid and extends to the right with a long horizontal stroke.

PAUL J. FISHMAN
United States Attorney